UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

United States Courts Southern District of Texas

FILED

JUL 13 2018

David J. Bradley Clerk of Court

§ Criminal

Criminal No. 6:17-35-S1

MARQ VINCENT PEREZ

v.

UNITED STATES OF AMERICA

EXHIBIT AND WITNESS LIST

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
					Graphics, Maps & Diagrams
1		7-9-2018	Y	4	Overall Timeline
2		プタ・2018	4	7	Timeline: Attempted Car Bombing (Dec 13-Jan 19)
3		7-9-2018	4	Υ	Timeline: First Burglary of the Mosque (Jan 20-24)
4		7-9-2018	Y	4	Timeline: Arson of the Mosque (Jan 25-28)
5		7-13-2018	γ	γ	Timeline: Aftermath (Jan 29 - Mar 3)
6		7-9-20iB	γ	γ	Map of Victoria (indicating 109 Cloverbloom, Mosque and Defendant's Home)
7		7-9-2018	γ	7	Map: Attempted Car Bombing (109 Cloverbloom)
8	•	7-9-2018	Υ	Y	Graphic - The Mosque
9		7-9-2018	Y	γ	Graphic - View from Women's Prayer Room
10		7-9-2018	Υ	У	Map: Proximity of Defendant's Home to the Mosque
11		7-9.2018	Y	Y	Map: Defendant's Photos of the Mosque on Fire

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
12		7-10-2018	γ	γ	Photo #1 Taken on Defendant's Phone and Comparison
13		7-10-2018	γ	γ	Photo #2 Taken on Defendant's Phone and Comparison
14		7-10-2018	γ	γ	Photo #3 Taken on Defendant's Phone and Comparison
15		7-10-2018	Y	γ	Photo #4 Taken on Defendant's Phone and Comparison
16		"7-10-2018	γ	У	Graphic - Search Warrant of Defendant's Home
17		7-10-2018	γ	γ	Graphic - Search Warrant of Defendant's Attic
				<u> </u>	Attempted Car Bombing
20		7-10-20:8	Y	Y	Item - improvised bomb found on scene at 109 Cloverbloom
21a		7-10-248	У	Y	Item - pieces of black electrical tape and gold colored glossy label from improvised bomb (ATF No. 56/Government Ex. 20)
21b		7-10-2018	Y	Y	Item - two small pieces of black electrical tape and green cord type pieces from improvised bomb (ATF No. 57/Government Ex. 20)
22		7-10-248	Y	Y	Item - shotgun shell found on scene at 109 Cloverbloom
23		7-10-2018	Y	Y	Video - from 109 Cloverbloom of attempted car bombing
24		7-10-2018	Y	Y	Photo - front windshield of car
25		7-10-2018	Y	Y	Photo - close up of windshield damage
26		7-10-2018	Y	γ	Photo - improvised bomb (intact) behind car
27		7-10-2018	Υ	Υ	Photo - car and shotgun shell
28		7-10-248	4	Y	Photo - close up of shotgun shell

Gov't Ex.	Def Ex.	Date Offered	Marked	Admitted	Description and Witness
No.	No.				Victoria Mosque (Before)
30		7.4.2018	γ	4	Photo - mosque office area
31		7-9-2018	γ	Υ	Photo - inside of mosque showing prayer clock
32		7.9.2018	Υ	Υ	Photo - inside of mosque from kitchen to main hall
33		7-9-2018	Υ	Υ	Photo - from women's prayer room with foosball table and bookcase with Qurans
34		7-9-2018	γ	γ	Photo - women's prayer room showing wooden tables and green mat
35		7.9.2018	γ	Υ	Photo - women's prayer room glass doors
36		7-9-2018	γ	γ	Photo - front view of mosque before fire
		1	•		Victoria Mosque (First Burglary)
40		7.9.2018	Y	γ	Photo - showing back doors of mosque pried open
41		7.9.2018	Y	Y	Photo - showing burglarized office in mosque area
42		7-11-2018	Y	Y	Photo - showing replaced smart meter
			•		Victoria Mosque (Second Burglary & Arson)
50		7.9-2018	Y	Υ	Video - mosque on fire
51		7-10-2018	Y	γ	Photo - firefighters in front of mosque with water spraying down, fire raging
52		7-10-2018	γ	γ	Photo - facing front door with water spraying down, fire raging
53		7-10-2018	γ	γ	Photo - front dome collapsing, fire raging
54		7-10-2018	Y	Υ	Photo - front of mosque after fire

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
55		7-10-2018	Y	Υ	Photo - corner of building where exterior electrical meter was, immediately after fire
56	-	7-10-2018	Ÿ	Υ	Photo - close up of exterior electrical meter, immediately after fire 1
57		7-10-2018	γ	γ	Photo - close up of exterior electrical meter, immediately after fire 2
58		7-10-2018	Ÿ	Y	Photo - back door frame of mosque with door gone
59		7-10-2618	γ	γ	Photo - from ladder looking down at top of mosque
60		7-10-2018	γ	γ	Photo - morning after, front view
61		7-10-2018	У	У	Photo - morning after, corner where exterior electrical meter is located
62		7-10-2018	γ	4	Photo - morning after, close up of exterior electrical meter
63		7-10-2018	Υ	Y	Photo - morning after, back of mosque with water spraying
64		7-9-2018	Υ	γ	Photo - morning after, from ladder overlooking mosque
65		7-10-2018	Υ	У	Photo - morning after, from ladder overlooking main hall, office, women's prayer room
66		7-10-2NB	γ	Y	Photo - morning after, close up of exterior electrical meter
67		7-10-2016	Y	Y	Photo - close up of missing smart meter
68		7-10-2018	γ	У	Photo - close up of exterior electrical meter base, top view
69		7-10-2018	У	Y	Photo - close up of exterior electrical meter base, bottom view
70		7-10-2018	γ	Υ	Photo - aerial view of mosque after arson from drone

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
71	2.2	7-10-2018	γ	У	Photo - aerial view of mosque after arson from drone 2
72		7-9-2018	γ	У	Item - burnt Quran
73		7-9-2018	γ	Υ	Item - burnt book stand for Quran
74		7-9-2018	Y	Ÿ	Item - paperback Quran
					Search Warrant of Defendant's Home
80		7-10-18	7	Υ	Item - pistol grip shotgun (back room)
81		7-10-18	Y	Y	Item - silver Lenovo laptop stolen from mosque (back room)
82		7-10-16	Y	У	Pawn Slip for 9mm Firearm (back room)
83		7-10-18	Y	γ	Item - gold Sony VAIO laptop stolen from mosque (attic)
84		7-16-2418	Υ	γ	Item - two boxes of Xtreme fireworks (attic)
85					[Blank]
86		7-10-2216	У	Υ	Defendant's phone (Samsung Galaxy S5, SM-G900P, including SD Card)
87		7.10-18	γ	У	Photo - pistol grip shotgun
88		7-10-2018	У	У	Photo - silver Lenovo laptop and Federal shotgun ammo
89		7-10-2014	γ	Y	Photo - bulletproof jacket in closet with ammo
90		7-10-2018	γ	У	Photo - close up of ammo in closet
91		7-10-18	γ	у	Photo - Eksen Arms shotgun in living room

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
92		7-16-18	7	4	Photo - close up of Federal shotgun ammo
93		7-10-18	7	4	Photo - garage with ladder to attic
94		7-16:18	4	4	Photo - ladder leads to attic
95		7-10-18	7	У	Photo - bag of fireworks
96		7-10-18	γ	γ	Photo - Xtreme fireworks box on ground
97		7-10-18	γ	Y	Photo - gold VAIO laptop under insulation in attic
98		7-16-18	Y	У	Photo - Xtreme fireworks box standing
99		7-10-18	y	γ	Photo - Defendant's home
					Various Documents / Records
101		7-11-2018	4	У	AEP Record Showing Smart Meter "Lost" Signal for burglary at 1:50 a.m.
102		7-11-2018	Y	4	AEP Record Showing Smart Meter "Lost" Signal for arson at 1:15 a.m.
103		7-11-2218	γ.	Y	GoFundMe Records
103A		7-11-2018	Υ	γ	Zoom in of GoFundMe Main Page
104		7-10-26	Y	Υ	Military Records of Defendant - Redacted
105		7-10-2018	Y	4	Photo - mosque rebuild
	.,		•		Defendant's Facebook Postings & Messages
110		7-10-248	Y	7	Defendant's Facebook Search Warrant Returns - Selected Excerpts (listed below) & Bus Record Aff

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
111		7-10-2018	4	Y	Defendant's 12/13/16 Facebook Post re Three Percenters
111A		7-10-2018	7	7	Defendant's 12/13/16 Facebook Post re Three Percenters - Context
112		7-10-2018	7	4	Defendant's 12/13/16 Facebook Message to JF re Rogue Units
113		7-10-2018	Y	Y	Defendant's 12/13/16 Facebook Message to JU re Delta Team Leader
114		7-10-2118	Y	7	Defendant's 12/23/16 Facebook Post re What's Coming
114A		7.10.2018	4	Y	Defendant's 12/23/16 Facebook Post re What's Coming - Context
115		7-10-2018	Y	7	Defendant's 12/23/16 Facebook Post re Step 1
115A		7-10-2018	Υ	Y	Defendant's 12/23/16 Facebook Post re Step 1 - Context
116		7-10-2018	γ	γ	Defendant's 1/4/17 Facebook Post re Armed Civilians
116A		7-10-2618	γ	γ	Defendant's 1/4/17 Facebook Post re Armed Civilians - Context
117		7-10-2016	7	Y	Defendant's 1/9/17 Facebook Post re Towelheads
117A		7-10-2018	4	Y	Defendant's 1/9/17 Facebook Post re Towelheads - Context
118		7-10-2012	γ	1	Defendant's 1/19/17 Facebook Post re Local Response Squad
118A		7.10-248	Y	Y	Defendant's 1/19/17 Facebook Post re Local Response Squad - No Context
119		7-10-2018	Y	γ	Defendant's 1/20/17 Facebook Posts (with Cavazos) re Surveillance of Victoria Islamic Center (based on screenshot given to law enforcement)
119A		7-10-248	Y	Y	Cavazos' Facebook Search Warrant Return - Selected Excerpts & Bus Record Aff

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
120		7-12-18	Ÿ	у	Defendant's 1/21/17 Facebook Message to KR re Strip Down Gun
121		7-12-248	γ	Y	Defendant's 1/21/17 Facebook Message to KR re Gonna Look at the Center
122		7-12-2018	У	У	Defendant's 1/22/17 Facebook Message to KR re Selling Phones I (making a G)
123		7-12-2018	γ	Y	Defendant's 1/23/17 Facebook Message to KR re Selling Phones II (counting phones)
124		7-12-248	y	γ	Defendant's 1/24/17 Facebook Message to KR re Selling Phones III (next lick)
125		7-12-2018	Y	4	Defendant's 1/25/17 Facebook Post re Muzzy
126		7-12-2018	γ	Y	Defendant's 1/25/17 Facebook Message to KR re Selling Phones IV (put em back on the market)
127		7-12-2018	Ÿ	γ	Defendant's 1/26/17 Facebook Message to KR re Getting Gear and Training
128		7-12-2018	γ	Y	Defendant's 1/26/17 Facebook Message to KR re Selling Phones V (trading for shoes)
129		7-12-2018	Å	Y	Defendant's 1/27/18 Facebook Message to KR re Scopin out a job
130		7-12-2018	¥	y	Defendant's 1/28/17 Facebook Message to KR re Preparing to go to Mosque
131		7-12-2418	Y	Υ	Defendant's 1/28/17 Facebook Message to KR re Selling Phones VI (you see the news)
132		7-10-2018	Υ	Y	Defendant's 1/28/17 Facebook Message to Val Cavazos re Victoria Arson
133		7-12-2018	γ	Y	Defendant's 1/28/17 Facebook Message to CR (being used by KR) re Selling Phones VII (Crossroads Suites)
134		7-12-2018	Y	γ	Defendant's 1/28/17-1/29/17 Facebook Message to KR re Selling Phones VIII (ride to mall)
135		7-12-2018	γ	Y	Defendant's 1/29/17 Facebook Message to KR re Selling Phones IX (\$350 waiting)

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136		7-12-298	Y	γ	Defendant's 1/30/17 Facebook Message to KR re Grandma found phones and selling phones for belt
137		7-12-2018	γ	Y	Defendant's 1/31/17-2/1/17 Facebook Message to KR re Cops have the phones
138	, , , ,	7-12-2018	γ	Υ	Defendant's 2/4/17 Facebook Message to KR re how would you know that we're suspects
139	,,,,,,,,,,	7-12-2018	Y	Ŋ	Defendant's 2/5/17 Facebook Message to KR re what kinda cop will believe that
140		7-12-2018	У	γ	Defendant's 2/6/17 Facebook Post re Muslim Immigrants
141		7-12-2018	γ	Y	Defendant's 2/14/17 Facebook Message to CR re Selling Phones X (Galaxy Tab A)
142	•	7-12-2018	Y	Υ	Defendant's 2/19/17 Facebook Message to KR re Your in th4 clear
143		7-12-2018	У	ý	Defendant's 2/20/17 Facebook Message to KR re You look like a wannabe rapist
144		7-12-2618	У	У	Defendant's 2/20/17 Facebook Message to KR re others admitting
145		7-10-2014	y	γ	Defendant's 2/21/17 Facebook Post re Goatfuckers
145A		7-10-2618	Y	Y	Defendant's 2/21/17 Facebook Post re Goatfuckers - Context
					Experts
					Certified Fire Investigator
161		7-11-2018	Y	γ	Graphics - visual aids explaining combustion, elements needed for fires, etc.
162		7-11-2018	Y	Y	Video - visual aid explaining concepts of fire science
163					[Blank]
164	J	7-11-2018	Υ	Y	Photo 2 of Evers's Presentation

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
165	1100	7-11-2018	Υ	γ	Photo 3 of Evers's Presentation
166	_ ,	7-11-2018	γ	γ	Photo 4 of Evers's Presentation
167		7-11-248	Υ	γ	Photo 5 of Evers's Presentation
168		7-11-2618	Υ	Υ	Photo 6 of Evers's Presentation
169		7-11-2018	γ	γ	Photo 7 of Evers's Presentation
170	,	7-11-2018	γ	У	Photo 8 of Evers's Presentation
171		7-11-2018	Y	У	Photo 9 of Evers's Presentation
172		7-11-2018	Y	γ	Photo 10 of Evers's Presentation
173		7-11-2018	1	γ	Photo 11 of Evers's Presentation
174		7-11-2018	Y	Y	Photo 12 of Evers's Presentation
175		7-11-2618	γ	Υ	Photo 13 of Evers's Presentation
176		7-11-2018	Y	Y	Photo 14 of Evers's Presentation
177	·	7-11-2018	γ	Υ	Photo 15 of Evers's Presentation
178		7-11-2018	Ÿ	y	Photo 16 of Evers's Presentation
179		7-11-2018	Y	У	Photo 17 of Evers's Presentation
180		7-11-2018	Y	y	Photo 18 of Evers's Presentation

Gov't Ex. No.	Def Ex. No.	Date Offered	Marked	Admitted	Description and Witness
181		7-11-2018	Y	У	Photo 19 of Evers's Presentation
182		1	1	Y	Photo 20 of Evers's Presentation
183			Y	Υ	Photo 21 of Evers's Presentation
184	-		Y	Ÿ	Photo 22 of Evers's Presentation
185			γ	У	Photo 23 of Evers's Presentation
186			Y	γ	Photo 24 of Evers's Presentation
187			У	γ	Photo 25 of Evers's Presentation
188			Ÿ	Y	Photo 26 of Evers's Presentation
189			Y	4	Photo 27 of Evers's Presentation
190					[Blank]
191			У	У	Photo 29 of Evers's Presentation
192			γ	Υ	Photo 30 of Evers's Presentation
193			У	γ	Photo 31 of Evers's Presentation
194			γ	Y	Photo 32 of Evers's Presentation
195			y	Y	Photo 33 of Evers's Presentation
196		7-11-2018	γ	Y	Photo 34 of Evers's Presentation

Gov't	Def	Date	Marked	Admitted	Description and Witness
Ex. No.	Ex. No.	Offered			
197		7-11-2018	Y	Υ	Photo 35 of Evers's Presentation
198		7-11-218	Y	Y	Photo 36 of Evers's Presentation
199		7-11-2018	γ	γ	Photo 37 of Evers's Presentation
200		7-11-2618	γ	Υ	Photo 38 of Evers's Presentation
201		7-11-2018	γ	γ	Photo 39 of Evers's Presentation
202		7.9.2118	Ÿ	Y	Photo 40 of Evers's Presentation
203		7-11-228	Y	Y	Photo 41 of Evers's Presentation
204	**	7-11-2018	Y	Y	Photo 42 of Evers's Presentation
205		7-11-2018	Y	Υ	Photo 43 of Evers's Presentation
210		7-10-2018	Υ	Υ	3D View - Mosque Inside
211		7-10-2018	γ	7	3D View - Mosque Outside
l.		<u> </u>	<u>P</u>		Digital Investigative Analyst
232		7-10-2018	1	Y	Photo from SD Card of serial number from pistol grip shotgun from 2.28.17 at 11:59 pm Hash No. 66366ceb6be86802f97ffc9d28fa4025
233		7-10-2018	Y	1	Photo from SD Card of pistol grip shotgun and pistol on bed from 12.30.17 at 8:09 am Hash No. c1688a5b5fd3980801df22e1a10b1832
234		7-10-2018	Y	1	Photo from SD card of pistol in hand from 12.30.17 at 8:10 am Hash No. 8eaaa1250f0de4fab008a52f776c8ce5
235		7-10-2018	Y	Y	Photo from SD card of mosque on fire from 1.28.2017 at 2:30:48 am Hash No. e9b3bc0ed74b6f901d96e7fca18ae794

Gov't	Def Ex.	Date Offered	Marked	Admitted	Description and Witness
Ex. No.	Ex. No.	Offered			
236		7-10-2018	Y	Υ	Photo of 201 E. Crestwood looking South
237		7-10-2018	Y	Y	Photo from SD card of N. Main Street near Wisteria from 1.28.2017 at 2:31:45 am Hash No. 71eb8a4e1b5c39b79b1d6d5d27646f32
238		7-10-2018	Y	Υ	Photo of N. Main Street near Wisteria looking South
239		7-10-2018	Y	Y	Photo from SD card of N. Main Street near Magnolia from 1.28.2017 at 2:31:56 a.m. Hash No. 395e4f9799f60462b475deb3149a1f17
240		7-10-2018	Y	Y	Photo of N. Main Street near Magnolia looking South
241		7.10-2018	Y	Y	Photo from SD card of mosque on fire from 1.28.2017 at 2:32:48 am Hash No. 1c6d12a289eff95ddbff7efe19de093e
242		7-10-2018	7	Υ	Photo of N. Main Street near Roseland Avenue looking SE
243		7-10-2016	Y	Y	Screenshots from Phone Hash No. 2709230658ca6a8e94cf8f5ae0d32f1 and 337fd5ed3c85e482c12e84c8c4b1cf5a
244		7-107018	Y	Y	Chrome Google Keyword URLs
245		7-10-2018	γ	Υ	Chrome Google Keyword Search Terms: "man caught burning down mosques" - 2.20.2017; 2.26.2017; "i don't remember my passcode to my lenovo laptop" 2.12.2017 - 2.13.2017; Chrome Web History: "how to restart macbook pro to
					factory settings" - 2.12.2017;
246		7-10-2018	Y	Y	Text Messages with Christopher Hirsch on 12.29.2017
247		7-10-2018	Ÿ	Y	Text Messages with Kristopher Thompson on 1.28.2017
248		7-10-2018	ÿ	Y	Screenshot from Defendant's phone from 12.3.2016 Hash No. 1386af77520270b3d74871144066ab66
		_1		L	Toolmark Examiner
250		7-11-2018	Y	Y	Graphic - explanatory diagram of pump action shotgun

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251		7-11-2018	Y	Y	Graphic - explanatory diagram of shotshell components
252		7-11-2018	Y	Y	Photo 1 of Jacobson's Examination
253		7-11-2018	Y	Y	Photo 2 of Jacobson's Examination
					Defendant's Interview
300		7-12-18	Y	Ϋ	Defendant's videotaped statement (with transcript merged)
301		7-12-18	γ	4	Defendant's Advice of Rights (written)
302		7-12-18	γ	Y	Clip 3:1-4:23 (Miranda Waiver)
303		7-12-18	У	Y	Clip 14:12 - 14:19 (Motive for Attempted Car Bombing)
304		7-12-18	y	У	Clip 18:35 - 20:21 (Claim that Pistol grip Shotgun purchased after Attempted Car Bombing)
305		7-12-18	У	У	Clip 28:1 - 29:9 (Didn't report stolen fireworks, Story about laptop in backyard doesn't make sense)
306		7-12-18	Y	У	Clip 31:5 - 31:22 (laptop found three weeks ago and heat sealed)
307		7-12-18	y	У	Clip 33:11 - 38:9 (Found the second laptop; didn't call police re the laptops he found)
308		7-12-18	Y	γ	Clip 73:7 - 76:29 (Didn't call police re laptops because thought he'd be a suspect)
309		7-12-18	Υ	Y	Clip 94:37 - 96:24 (Doesn't like Muslims)
310		7-12-16	Y	Y	Clip 97:24 - 99:26 (D's Facebook account - Muslims planning armed takeover)
1				•	Stipulations
330		7-12-18	γ	Υ	Stipulations

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